

December 22, 2004

Food and Drug Administration
Department of Health and Human Services
Division of Dockets Management
5630 Fishers Lane, rm.1061
Rockville, MD 20852

Re: Docket No. 2000N-0504

People for the Ethical Treatment of Animals (PETA) is an international nonprofit organization with more than 800,000 members and supporters dedicated to ending animal suffering. Please accept the following comments on behalf of our members regarding the federal register notice (21 CFR Parts 16 and 118) requesting written statements on the topic of "Prevention of *Salmonella enteritidis* in Shell Eggs During Production."

First, we urge the Department of Health and Human Services to significantly alleviate animal suffering and human illness by supporting a strict prohibition on the practice of forced molting, which involves food deprivation of hens for up to two weeks. This practice that has been scientifically shown to increase the frequency and severity of *Salmonella enteritidis* (*Se*) in both hens and humans. It is absolutely critical to exterminate vectors of transmission, such as forced molting, that cause eggs to become infected in the first place.

Many leading scientists have published research that clearly establishes the connection between the practice of the starvation-induced molting of laying hens and the increased incidence of *Se* bacteria in the eggs they produce. Dr. Peter Holt, who has studied the link between forced molting and salmonella for over a decade, is currently conducting research on forced molting sponsored by the USDA Agricultural Research Service. Dr. Holt's preliminary findings show that forced molting makes hens 100 to 1,000 times more susceptible to Salmonella infections. Another USDA study concludes that forced molting increases the frequency and severity of *Se* infections of a flock¹ and "could conceivably alter the *Se* situation in a flock from a minor problem involving a small number of birds to one where a large number of birds [are] affected."² Similarly, researchers at the University of Florida have shown that the stress caused by a forced molt significantly compromises the immune system of laying hens, resulting in higher levels of *Se* infections.³ The study also concludes that starvation-induced molting puts the entire flock at risk for *Se* infection: "Molted birds shed significantly higher numbers of *Se* during a forced molt as compared to unmolted birds ... and [forced molting] causes an increase in the transmission of *Se* to uninfected hens housed in adjacent cages."⁴ Researchers have also conclusively demonstrated that chickens who are not forcibly molted experience significantly lower *Se* infection rates; the Food Animal Concerns Trust, for instance, reports that on farms that do not resort to forced molting, the incidence of *Se* infection is reduced by up to seventy percent. These studies are only a sampling of the comprehensive body of research that highlights the dangerous implications forced molting has for both animal and human health.⁵

Government agencies agree that a ban on forced molting will help to prevent *Se* transmission during egg production. The U.S. Department of Agriculture recently reported that the number of human *Se* infections would be significantly reduced if forced molting were eliminated.⁶ In accordance with these findings, the USDA's Food Safety and Inspection Service (FSIS) advises that "in an effort to reduce human illnesses caused by *Se*, FSIS is encouraging poultry and egg producers to eliminate forced molting practices."⁷ These reports and recommendations clearly demonstrate the connection between forced molting and egg contamination.

Top consumer groups, including the Center for Science in the Public Interest, Consumers Union (publisher of *Consumer Reports*), and Public Citizen, have joined scientists and government agencies in taking a strong stance against forced molting. This year, the American Veterinary Medical Association also announced its opposition to the practice, stating in a resolution that "neither water nor food should be withdrawn⁸". Even the United Egg Producers Animal Welfare Committee recently wrote that "we do not

believe that feed restriction or withdrawal to induce a molt should be continued.” The overwhelming evidence that eliminating forced molting would significantly reduce human *Se* infections across the country and improve animal health lend strong support to our call for the FDA and other government agencies to take the necessary measures to ensure that people are not put at risk by farms that continue to engage in this practice.

The connection between forced molting and Salmonella contamination has serious implications for public health. The USDA’s conservative estimate finds that human salmonella infections from eggs would be reduced by 2.1 percent if forced molting were eliminated.⁹ According to the Centers for Disease Control and Prevention, the total estimated number of cases of Salmonella in the United States each year is roughly 1.4 million¹⁰. Thus, by eliminating forced molting, approximately 29,400 cases of *Se* poisoning can be avoided in the U.S. every year.¹¹ Furthermore, applying national fatality rate provided by the Centers for Disease Control and Prevention, we can see that eliminating forced molting would save approximately 8 lives every year, and could save as many as 400.¹²

According to the CDC, salmonella directly necessitates 170,000 visits to physicians, 16,400 cases of hospitalization and 600 deaths annually¹³. They calculate the total annual salmonella-related costs to be between \$0.5 and \$2.3 billion annually¹⁴. Using the conservative USDA estimate that 2.1% of salmonella cases would be prevented annually by eliminating forced molting, the country and its citizens will save, between, \$10,500,000 and \$48,300,000 each year if this practice is banned¹⁵. If pain, suffering, and chronic disease costs were also included, these calculated savings would be significantly higher.

It is imperative that the Department of Health and Human Services acts to protect the public from *Se* infection by explicitly prohibiting the practice of forced molting. Forced molting poses serious risks to the health and welfare of both humans and hens, and the occurrence of fatal *Se* poisonings and the severe animal suffering caused by starvation-induced molting have been widely documented. Given the substantial evidence linking forced molting to increased *Se* infection rates, it would be both irresponsible and inadvisable to delay the passage of a ban on forced molting. Once again, on behalf of our members, we urge Health and Human Services to help reduce human illness, animal suffering, and *Se*-related medical costs by supporting the strict prohibition of the practice of forced molting.

Thank you for the opportunity to comment.

Sincerely,

Eric Jonas
Research Assistant
International Grassroots Campaigns Department

References

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 - ² *Ibid*, p. 1847.
 - ³ Gary D. Butcher, D.V.M., Ph.D. and Richard Miles, Ph.D., “Salmonella Control and Molting of Egg-Laying Flocks—Are they Compatible?” Fact Sheet VM 92 (University of Florida, Jul. 1994).
 - ⁴ *Ibid*, p. 2.
 - ⁵ For other studies, please see:
Gary D. Butcher, D.V.M., Ph.D., and Richard Miles, Ph.D., Institute of Food and Agricultural Sciences Fact Sheet VM 92, “Salmonella Control and Molting of Egg-Laying Flocks – Are They Compatible?” (University of Florida, Jul. 1994).
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- P.S. Holt, N.P. Macri, and R.E. Porter, "The Effects of Induced Molting on the Severity of Acute Intestinal Infection Caused by *Salmonella enteritidis*," Agricultural Research Service Report No. 0000070701 (1996).
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- ⁶ USDA Farm Animal Well-Being Task Group, "Meeting Summary," Washington, D.C., 21 Jul., 1998.
- ⁷ In a letter dated Aug. 21, 1998, from Patricia Stolfa, Acting Director, Regulations Development and Analysis Division, Office of Policy, Program Development and Evaluation, U.S. Food Safety and Inspection Service
- ⁸ Induced molting position statement revised. American Veterinary Medical Association, 141st Convention Daily News. July 25, 2004. <http://avma.org/convention/news/sunday03.asp>
- ⁹ USDA Farm Animal Well-Being Task Group, "Meeting Summary," Washington, D.C., 21 Jul., 1998.
- ¹⁰ Frenzen P, Riggs T, Buzby J, Breuer T, Roberts T, Voetsch D, Reddy S, and the FoodNet Working Group, Centers for Disease Control and Prevention. *Salmonella* cost estimate update using FoodNet data. Food Review. 1999; 22 (2): 10-15. http://www.cdc.gov/foodnet/pub/publications/frenzen_p/frenzen_p.htm
- ¹¹ 2.1 percent of 1,400,000 is 29,400.
- ¹² *Ibid*
- ¹³ *Ibid*
- ¹⁴ *Ibid*
- ¹⁵ 2.1 percent of \$500,000,000 is \$10,500,000. 2.1 percent of \$2,300,000,000 is \$48,300,000.